

Cohen
3-15-85

Superfund Comments: Tier 2A Sampling Plans

Alkali Lake, St. John's Landfill, Pasco Sanitary Landfill

Overall Comments1. ~~Section 4~~ Appendix A

needs clarify

- More clearly describe which wastestreams are likely to contain dioxins and where these wastes are buried. This section is a bit confusing in all three sampling workplans.

2. Section 7, Appendix B

pg B7-1

- Replace last sentence of the 1st paragraph with the following: "The following analytical procedures are recommended by Ecology and Environment".

St. John's Landfill

1. 2,4D Analysis

- Analysis for 2,4D and other pesticides sent to the site by Rhone-Poulenc should be used as an initial screen under Option 1 or Option 2. If the pesticides are identified, analysis for dioxins will then be undertaken. This approach will substantially reduce the cost of the study, and has been agreed to by EPA Headquarters.

2. Priority Pollutant Analysis

- EPA may choose to include plans to analyze a select group of samples for priority pollutants. Plans are to be proposed by E&E.



Pasco Sanitary Landfill

1. Clarify study objectives (p. 1-1).

- Suggested language: "Records indicate that wastes potentially contaminated with dioxin are buried in three disposal areas at the Pasco Sanitary Landfill. The purpose of this study is to determine if dioxin is migrating from the disposal areas, and if further investigation of the site is necessary." *done*

2. Hydrogeology/ Groundwater Sampling

- Page 3-7 states that groundwater flows in the southwesterly direction. If E&E is confident with this statement, wells should be placed downgradient of each disposal area. If groundwater flow cannot be determined at this time, J. Sceva recommends that three wells be drilled on the Pasco site to determine gw flow, and then two wells can be drilled downgradient of each disposal area. This will reduce the number of wells (and cost) needed at the site. *Yes*

3. 1975 WDOE Sampling (p.3-12)

- Provide more detail on the sampling that was conducted (# samples, location, etc). Add statement as to why more sampling is necessary at this time. *on-line plan - how 10' out* *none available*

4. Analysis

- Does E&E recommend that all samples taken be analyzed for priority pollutants (page 6-2)? Please clarify. *EPA needs study 1960*
- Will there be a substantial cost saving if samples are analyzed first for Rhone-Poulenc pesticides, and then analyzed for dioxin if positive pesticide results are found? Let's discuss. *Yes*

5. ~~Section 4~~ Appendix A

- Page 2-1 indicates that 2,4 D wastes are likely to contain dioxin. Is this consistent with Section 4? *OK 2/4/91*
- Summary (page 4-9) concludes that dioxin is not likely to migrate off-site. Add a statement that explains that dioxin may migrate with other "carrier" pollutants. *OK 2/6/91*

Pasco 6-7/91

OK 2/4/91
OK 2/6/91
23
April
10
plot mis on sampling

Alkali Lake

1. Sampling of landfarmed areas (p.5-1)

- Can we reduce sampling of landfarmed areas based on records of the types of wastes that were landfarmed? That is, if the landfarmed wastes are not likely to contain dioxin we do not need to sample that area.
- Do special arrangements have to be made to gain access to the landfarmed areas?

2. Groundwater Sampling (p.5-6)

- The plan indicates that groundwater samples will be taken from 12 piezometers currently located within the CDS. Indicate depth from which samples will be taken.
- Page 5-7 says that 2,4-D has migrated off-site. How far has the 2,4D migrated? At what locations is this documented? By who? When? Perhaps we can sample these locations for dioxin and analyze only if dioxin is found in the groundwater from wells on-site.

3. Summary Statement for Section ~~Appendix~~ 4

- Summary statement (page 4-8) says field investigations is focused only on those areas suspected of containing 2,4D residues, rather than entire landfill. I do not think this statement applies to this site.